

CC Docket No. 94-102 – E911 Interim Report

Filed By: Americell PA-3 L. P.
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Date: August 1, 2003

To: Marlene H. Dortch
Secretary
Federal Communications Commission
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Washington, DC 20554

By Electronic Submission:

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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| In the Matter of |) | |
| |) | |
| Revision of the Commission's Rules To |) | CC Docket No. 94-102 |
| Ensure Compatibility with Enhanced 911 |) | |
| Emergency Calling Systems |) | |
| |) | |
| Phase II Compliance Deadlines for Non- |) | |
| Nationwide CMRS Carriers |) | |
| |) | |
| |) | |
| To: The Commission |) | |

INTERIM REPORT REGARDING E911 PHASE II DEPLOYMENT

Americell PA-3 L.P.

Americell PA-3 L.P. (Americell), hereby submits this Interim Report on E911 Phase II deployment as required by the Commission's *Non-Nationwide Carrier Order*. Americell operates in the Pennsylvania 3 (Potter) Rural Service Area in the A band of the Cellular Mobile Radio Service. Americell has fewer than 500,000 subscribers, and is thus a Tier III wireless carrier. This report follows the format suggested by the "Further Guidance" Public Notice released on June 30, 2003.

1. The Number of Phase I and Phase II Requests from PSAPs

Americell has not received any E911 Phase I or E911 Phase II requests.

2. The Carrier's Specific Technology Choice

Americell operates a TDMA network. As far as Americell is aware, there are no ALI capable TDMA handsets available or planned for production. For this reason, Americell plans to deploy a network-based solution for E911 phase II. Americell is deeply concerned, however, that the accuracy requirements of the Commission's regulations will be extremely difficult for rural carriers to meet without destroying their economic viability.

3. Status of Ordering and/or Installing Necessary Network Equipment

Americell successfully upgraded our Nortel switch to the required software load for E911 Phase I (MTX09) in January of 2002. As of that date, Americell's switch is

fully capable of E911 Phase I. All equipment that is required to comply with an E911 Phase I request is in place.

Americell successfully upgraded our Nortel switch to the required software load for E911 Phase II (MTX10) in June of 2002. As of that date, Americell's switch is fully capable of E911 phase II. We have not ordered any other equipment for Phase II implementation, since we have not yet received a Phase II request.

4. **ALI-Capable Handset Availability**

ALI capable TDMA handsets are not available from any manufacturer.

5. **The Estimated Date on which Phase II Service will be Available in The Carrier's Network**

Americell anticipates being able to deploy Phase II capability within six months of receipt of a Phase II PSAP request. Americell does, however, anticipate difficulties in meeting the FCC's location accuracy requirements, given the rural nature of our coverage area.

6. **Information on Whether the Carrier is On Schedule to Meet the Ultimate Implementation Date of December 31, 2005.**


Americell's E911 Phase II implementation date will depend upon the requirements of the PSAPs that we serve, and their ability to handle Phase II information. At this time, we anticipate no difficulties in our responding to a PSAP request in a timely manner.

Declaration of David P. Tews

I, David P. Tews, Vice President of Americell PA-3 L.P., do hereby declare under penalty of perjury that I have read the foregoing E-911 Interim Report and that the facts stated therein are true and correct, to the best of my knowledge, information and belief, and are made in good faith.

A handwritten signature in black ink, appearing to read "D. P. Tews", written over a horizontal line.

David P. Tews

A handwritten date "8-1-03" in black ink, written over a horizontal line.

Date